

Christopher A. Seeger, Esq.  
Stephen A. Weiss, Esq.  
SEEGER WEISS LLP  
One William Street  
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Tel. (212) 584-0700  
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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MILTON CIPLET, Individually and on Behalf  
of Itself and All Others Similarly Situated,  
Plaintiff,

Plaintiff,

v.

JPMORGAN CHASE & CO. and J.P.  
MORGAN SECURITIES INC,

Defendants.

**Civil Action No.: 08-cv-4580 (RMB)**

**MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

**ELECTRONICALLY FILED CASE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Stephen A. Weiss, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of the following two attorneys of the same firm:

Applicants' Names: NORMAN E. SIEGEL and MATTHEW L. DAMERON  
Firm Name: Stueve Siegel Hanson LLP  
Address: 460 Nichols Road, Suite 200  
City/State/Zip: Kansas City, Missouri 64112  
Tel: (816) 714-7170  
Fax: (816) 714-7101

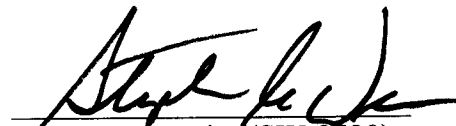
NORMAN E. SIEGEL is a member in good standing of the United States District Court for the Western District of Missouri. There are no pending disciplinary proceedings against Mr. Siegel in any State or Federal Court. Attached hereto as Exhibit A is an original certificate of good standing for Mr. Siegel from United States District Court for the Western District of Missouri.

MATTHEW L. DAMERON is a member in good standing of the United States District Court for the Western District of Missouri. There are no pending disciplinary proceedings against Mr. Dameron in any State or Federal Court. Attached hereto as Exhibit A is an original certificate of good standing for Mr. Dameron from the United States District Court for the District of Kansas and the Western District of Missouri.

Dated: August 15, 2008

New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen A. Weiss", is written over a horizontal line.

Stephen A. Weiss (SW-3520)  
Christopher A. Seeger (CS-4880)  
SEEGER WEISS LLP  
One William Street  
New York, NY 10004  
(212) 584-0700 telephone  
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Tel. (212) 584-0700  
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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MILTON CIPLET, Individually and on Behalf  
of Itself and All Others Similarly Situated,  
Plaintiff,

Plaintiff,

v.

JPMORGAN CHASE & CO. and J.P.  
MORGAN SECURITIES INC,

Defendants.

Civil Action No.: 08-cv-4580 (RMB)

**AFFIDAVIT OF STEPHEN A. WEISS  
IN SUPPORT OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

ELECTRONICALLY FILED CASE

State of New York     )  
                                  )     ss:  
County of New York    )

Stephen A. Weiss, being duly sworn, hereby deposes and says as follows:

1. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in June 1992. I am also admitted to the bar of the United States District Court for the Southern and Eastern District of New York, and am in good standing thereof.

2. I am a partner at the law firm of Seeger Weiss LLP, and my office is located at One William Street, New York, NY 10009. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Norman E. Siegel

and Matthew L. Dameron, of the firm Stueve Siegel Hanson LLP, as counsel *pro hac vice* to represent the Movant Plaintiff Thomas C. Assif in this matter.

3. Norman E. Siegel is a partner of the law firm Stueve Siegel Hanson LLP.

4. Matthew L. Dameron is an associate with the law firm Stueve Siegel Hanson LLP


5. Although I have known Norman Siegel and Matthew L. Dameron for a short time, I have known of their firm, Stueve Siegel Hanson LLP, for a considerably long period of time and can attest to Mr. Siegel's and Mr. Dameron's fine qualities as skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Norman E. Siegel and Matthew L. Dameron, *pro hac vice*. A proposed order is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Norman E. Siegel and Matthew L. Dameron to represent Movant Plaintiff Thomas C. Assif in the above captioned matter, be granted.

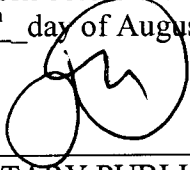
Dated: August 15, 2008  
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stephen A. Weiss', is written over a horizontal line.

Stephen A. Weiss (SW-3520)  
Christopher A. Seeger (CS-4880)  
SEEGER WEISS LLP  
One William Street  
New York, NY 10004  
(212) 584-0700 telephone  
(212) 584-0799 facsimile

Sworn before me this  
15<sup>th</sup> day of August 2008

A handwritten signature in black ink, appearing to be "Jose D. Mora", written over a horizontal line.

NOTARY PUBLIC

**Jose D. Mora**  
**Notary Public State of New York**  
**No. 03-6062383 Qualified in Bronx County**  
**Certificate Filed in New York County**  
**Commission Expires August 6, 2009**

**CERTIFICATE OF SERVICE**

J. Daniel Mora, being duly sworn, hereby deposes and says:

I am over the age of eighteen years and not a party to the within action and am employed by the firm Seeger Weiss LLP, counsel for the plaintiff.

On August 15, 2008 I cause a true and correct copy of the foregoing  
**PLAINTIFF'S MOTION TO ADMIT COUNSEL *PRO HAC VICE***, to be served via U.S. Mail,  
with proper postage prepaid on all counsel of record at the following addresses:

**Jules Brody**

James Henry Galvin  
Stull Stull & Brody  
6 East 45th Street, 5th Floor  
New York, NY 10017  
[ssbny@aol.com](mailto:ssbny@aol.com)

*Representing Movant David Nierenberg,  
(Movant) Robert H Shenker*

**Wai Kin Chan**

**Curtis Victor Trinko**  
Law Offices of Curtis V. Trinko, LLP  
16 West 46th Street, Seventh Floor  
New York, NY 10036  
[kchan@trinko.com](mailto:kchan@trinko.com)

*Representing Plaintiff Milton Ciplet*

**Christine McAteer Ford**

Thomas C. Rice  
**Jonathan K. Youngwood**  
Simpson Thacher & Bartlett LLP (NY)  
425 Lexington Avenue  
New York, NY 10017  
[cford@stblaw.com](mailto:cford@stblaw.com)

*Representing defendant J.P. Morgan  
Securities Inc., JP Morgan Chase &  
Co.*


**Jonathan K. Levine**

Girard Gibbs & De Bartolomeo, LLP  
601 California St, Suite 1400  
San Francisco, CA 94108  
[jkl@girardgibbs.com](mailto:jkl@girardgibbs.com)

*Representing Movant Thomas C. Assif*

Representing Citigroup Inc., Citigroup Global Markets, Inc., and Citi Smith Barney

Dated: August 15, 2008

  
\_\_\_\_\_  
J. Daniel Mora

# EXHIBIT A

I, Patricia L. Brune, Clerk of the United States District Court for the Western District of Missouri,

Norman E. Siegel is currently in an active status and has not been disciplined by this Court.

*Patricia H. Bruce*

Patricia L. Brune, Court Executive

By Georgia Kee  
Deputy Clerk



**CERTIFICATE OF GOOD STANDING**

**UNITED STATES OF AMERICA** )  
 )  
**WESTERN DISTRICT OF MISSOURI** )      ss.

I, Patricia L. Brune, Clerk of the United States District Court for the Western  
District of Missouri,

DO HEREBY CERTIFY that Matthew L. Dameron was duly admitted to practice  
in said Court on October 25, 2002.

Matthew L. Dameron is currently in an active status and has not been  
disciplined by this Court.

Dated at Kansas City, Missouri  
on August 14, 2008



\_\_\_\_\_  
Patricia L. Brune, Court Executive

By Georgia Kee  
Deputy Clerk

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Lisa Swanson, Individually  
And On Behalf of All Others Similarly Situated,

Plaintiff,

v.

Citigroup Inc., Citigroup Global Markets, Inc. and  
Citi Smith Barney,

Defendants.

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**Civil Action No.: 08-cv-3139**

**ORDER FOR ADMISSION  
PRO HAC VICE ON  
WRITTEN MOTION**

**ELECTRONICALLY FILED CASE**

Upon the motion of Stephen A. Weiss, attorney for Movant Plaintiff Thomas C. Assif, and said sponsor of attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

NORMAN E. SIEGEL & MATTHEW L. DAMERON  
Stueve Siegel Hanson  
460 Nichols Road Suite, 200  
Kansas City, Missouri  
Email: [nsiegel@stuevesiegel.com](mailto:nsiegel@stuevesiegel.com)  
[mdameron@stuevesiegel.com](mailto:mdameron@stuevesiegel.com)

are admitted to practice *pro hac vice* as counsel Movant Plaintiff Thomas C. Assif in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2008

New York, New York

By: \_\_\_\_\_  
United States District Court Judge